

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|  |  |
|--|--|
| <p>ROBERT CORWIN on behalf of himself and<br/>all others similarly situated,</p> <p>Plaintiff,</p> <p>-v-</p> <p>BERND R. SEIZINGER, MARTINE<br/>GEORGE, MARCEL ROSENCZWEIG, and<br/>GPC BIOTECH AG,</p> <p>Defendants.</p>    | <p>Case No.: 07-CV-6728-DC</p> <p>ECF CASE</p> |
| <p>AUDREY DANG, on behalf of himself and all<br/>others similarly situated,</p> <p>Plaintiff,</p> <p>-v-</p> <p>GPC BIOTECH AG, BERND SEIZINGER,<br/>MARTINE GEORGE, MARCEL<br/>ROZENCWEIG,</p> <p>Defendants.</p>             | <p>Case No. 07-cv-07476-DC</p>                 |
| <p>ISTVAN TEMESFOI, on behalf of himself and<br/>all others similarly situated,</p> <p>Plaintiff,</p> <p>-v-</p> <p>GPC BIOTECH AG, BERND R. SEIZINGER,<br/>MARTINE GEORGE, and MARCEL<br/>ROSENCZWEIG,</p> <p>Defendants.</p> | <p>Case No. 07-cv-7016</p>                     |

**NOTICE OF MOTION AND MOTION OF THE GPC BIOTECH GROUP FOR THE  
CONSOLIDATION OF ALL RELATED ACTIONS; TO BE APPOINTED LEAD  
PLAINTIFF AND FOR APPROVAL OF LEAD PLAINTIFF'S SELECTION OF  
LEAD COUNSEL**

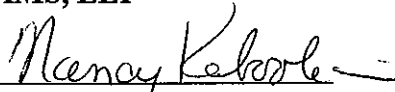
PLEASE TAKE NOTICE that pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA"), class member Agamemnon Chua, Dhruvajyoti Biswas, Lars Koernig Kron and Frank Von Tempelhoff (hereinafter "GPC Biotech Group" or "Movant"), hereby moves this Court at the United States District Court for the Southern District of New York, located 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order: (i) consolidating all related cases and any subsequently filed related cases; (ii) appointing the GPC Biotech Group as Lead Plaintiff in the consolidated action and any subsequently filed related cases; and (iii) approving lead plaintiff's selection of Abbey Spanier Rodd & Abrams, LLP as Lead Counsel.

This Motion is based on the accompanying Memorandum of Points and Authorities in support thereof, the Declaration of Nancy Kaboolian filed herewith, and all prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

Dated: September 24, 2007  
New York, New York

Respectfully Submitted,

**ABBEY SPANIER RODD &  
ABRAMS, LLP**

By:   
Arthur N. Abbey  
Nancy Kaboolian. (NK 6346)  
212 East 39<sup>th</sup> Street  
New York, New York 10016  
Tel: (212) 889-3700  
Fax: (212) 684-5191

Laurence D. Paskowitz, Esq.  
Roy L. Jacobs, Esq.  
PASKOWITZ & ASSOCIATES  
60 East 42<sup>nd</sup> Street, 46<sup>th</sup> floor  
New York, New York 10016  
Tel: (212) 685-0969  
Fax: (212) 685-2306